

THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS,  
HOUSTON DIVISION

**EILEEN PENA,**  
*Plaintiff,*

v.

**THE TEXAS RENAISSANCE  
FESTIVAL AND STARGATE MANOR  
ARBORETUM**  
*Defendant*

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CIVIL ACTION NO. \_\_\_\_\_

JURY DEMANDED

**PLAINTIFF'S ORIGINAL COMPLAINT**

**1. PRELIMINARY STATEMENT**

1.1. Plaintiff demands a jury for any and all issues triable to a jury. This action seeks declaratory, injunctive, and equitable relief; compensatory, liquidated and actual damages; and costs and attorney's fees for the wrongful termination suffered by Plaintiff, EILEEN PENA (hereinafter "Plaintiff" or "Pena"), due to THE TEXAS RENAISSANCE FESTIVAL AND STARGATE MANOR ARBORETUM., (hereinafter "Defendants") taking adverse employment actions against her in violation of the Title VII of the Civil Rights Act, as amended, 28 U.S.C. § 1331.

**2. PARTIES**

2.1. Plaintiff, EILEEN PENA, is an individual residing in Texas.

2.2. Defendant THE TEXAS RENAISSANCE FESTIVAL is a Texas corporation with its principal place of business in the state of Texas, and may be served with process by serving its registered agent for service of process, George Coulam, 21778 FM 1774, Plantersville, Texas 77363.

- 2.3. Defendant STARGATE MANOR ARBORETUM is a Texas Corporation with its principal place of business in the state of Texas, and may be served with process by serving its registered agent for service of process, George Coulam, 10390 Deerwood Drive, Plantersville, Texas 77363.
- 2.4. The Texas Renaissance Festival and Stargate Manor Arboretum are a single integrated enterprise.

### **3. VENUE**

- 3.1. Venue of this action is proper in this court, pursuant to 28 U.S.C. § 1391(b), because a substantial part of the events or omissions giving rise to the claim occurred in this judicial district.

### **4. JURISDICTION**

- 4.1. Jurisdiction is invoked pursuant to 28 U.S.C. § 1343(a)(4), and Title VII of the Civil Rights Act, as amended, 28 U.S.C. § 1331.
- 4.2. Jurisdiction is appropriate because Plaintiff filed a formal complaint with the Equal Employment Opportunity Commission.
- 4.3. Jurisdiction is also appropriate since the Department of Justice issued a decision allowing the Plaintiff the right to sue.

### **5. FACTS**

- 5.1 On Monday, November 23, 2015, Eileen Pena was called and offered a full-time position by Terre Albert at the Texas Renaissance Festival Association (“TRF”). She had been introduced to this role by an employment agency, Metroworth Consulting, as a full-time permanent employee supporting Terre Albert – General Manager, TRF in the office building located on the festival grounds. However, *after* accepting the position and turning down another job offer, she discovered she was actually hired to work as the

Personal Assistant to George Coulam (“Coulam”), TRF’s owner, and as the Accounting Assistant to Stargate Manor Arboretum (“SMA”) with the work being done at Coulam’s home estate. Coulam was aggressive with Ms. Pena during her employment, and tasked her with several unwelcome, sexually offensive and inappropriate personal tasks such as finding him women to date and managing others tasked with finding him women.

5.2 December 21, 2015, Ms. Pena was asked by Coulam to work with the housekeeper, Lisa Sykes Wallace, to start scrolling internet based on-line dating sites for him. At this time, Coulam was already paying Melissa McConnell to scroll the “Sugar Daddy” dating sites (sites with women seeking a prostitute styled arrangement with men), but he wasn’t pleased with the volume of results (“dates”). Ms. Pena was also tasked with making folders on the different women that included pictures and notes by Melissa and Coulam. Ms. Pena had to make two copies of every folder – one for him and one to keep in her office as back-up. He also shared demeaning stories of the women with Ms. Pena. While she objected to scrolling these dating websites due the inappropriateness of the request, as well as knowing the depravity of the sites she’d be “scrolling” for him, Ms. Pena was uncomfortable and reported so to Coulam. In order to avoid potential retaliation, Ms. Pena instead pointed out how far behind the accounting was on his personal financial books from the previous assistant’s work performance – how she didn’t have time to devote to “scrolling” dating sites for him. Coulam agreed that Ms. Pena did not have time given her workload, and then stated he’d been warned he could be sued for making employees do this.

5.3 Still dissatisfied of the volume of dates Melissa McConnell produced for him, in early 2016, Coulam tasked Ms. Pena with placing an ad for someone with “social media” skills

in order to hire another contractor to scroll dating websites for him. In preparation, he tasked Ms. Pena with verifying the username and password for each site on the master list, including the “Sugar Daddy” sites to ensure they were correct. This list included, but was not limited to, such websites as “Sugar Daddy for Me,” “Sugar Daddy Meet,” “Seeking Arrangement,” and “LocalSexFriends.com.” The pictures that appeared when logging into some of these websites was often of an extremely vulgar nature (i.e. nude women lying on their backs with their legs spread open).

- 5.4 Still not satisfied with the volume of dates produced by the additional contract scroller, in February 2016, Coulam tasked Ms. Pena with hiring a full-time SMA assistant, Tiffani Childs-Ui Ciarraide, who could devote at least half of her day to scrolling dating websites for him. As with the contract scrollers, Coulam tasked Tiffani with finding and printing dating site profiles to include pictures of women sometimes scantily clothed, and as per the norm, profiles and pictures were left on his desk where everyone, including myself, could see.
- 5.5 On April 14, 2016, Coulam made Ms. Pena type his “Bible P.P.F. Quest” (PPF=Princess Passion Flower or Perfect Passion Flower), which is a checklist of his goal to find the “perfect woman”. In this checklist, Ms. Pena was required to type topics he would cover with the “potential PPF,” including among other things, sex, money, and companionship.
- 5.6 Without solicitation on Ms. Pena’s part, Coulam also shared demeaning stories of the women with her and Tiffani, and on June 9, 2016, he collected and took both Tiffani and Ms. Pena to his art studio where he proceeded to educate them on the “Sugar Daddy – Sugar Mama” relationship dynamics, expectations, financial arrangements, etc., then he told them about a “Sugar Mama” he was pursuing and asked the two women for their

opinion.

- 5.7 On June 14, 2016, Coulam went to lunch with a 20 year old stripper named Chloe and had the hostess take a picture of them. Coulam instructed Ms. Pena to download and print out the picture.
- 5.8 On July 8, 2015, Coulam went to lunch with a young stripper named Tina. In the next few days, Coulam had Ms. Pena type a check sheet planning Tina's life including "pre-nup" and "sex."
- 5.9 On Monday, July 11, 2016, Coulam slapped Ms. Pena hard across the back and told her he was going to beat her.
- 5.10 Sometime in Mid-July 2016, Coulam went on a date with a young stripper named Melody whom he then brought back to the office/his home and into his bedroom while Ms. Pena was still working. This was the second time a "date" was brought back to his home and into his bedroom during business hours while Ms. Pena and the rest of the staff were there. Ms. Pena was tasked with setting up a Harris County Toll Road Association ("HTRA") account for Melody while this was going on. Later Coulam had Ms. Pena download and print depraved pictures from his phone of him and Melody taken with a selfie-stick in his bathroom with her in her underwear posing with him, and he wrote notes about her including "test drive Melody."
- 5.11 On July 22, 2016 Coulam tasked Ms. Pena with making a list of online religious stores. After she made the list, he asked to sit at her desk so he would see the website and have her scroll through it for him. Ms. Pena's computer set up was at an angle on the corner where two desk pieces met, so it was very awkward to stand over him and scroll for him. It required Ms. Pena to lean and contort her body, and stay in this awkward position for a

long time. Ms. Pena's hand was already on the mouse about to start scrolling, when with force, Coulam shoved her keyboard to the right and it landed on top of her arm and hand. It had been in the way of him resting his arms on the desk. Later when Ms. Pena complained her back and arm were hurting (from being in that contorted position so long), appearing visibly angry he said with a demeaning tone of sarcasm, "Oh you poor thing!", and then stormed out of her office.

5.12 On July 28, 2016, in performing her dating site scrolling duties for Coulam, Tiffani Childs-Ui Ciarraide printed a profile that contained a completely naked woman posing very provocatively, which like all women profiles with pictures she printed for him and left out on his desk for everyone to see including Ms. Pena.

5.13 On Friday, July 29, 2016, at lunchtime – Ms. Pena's last day before beginning a one week vacation, Coulam found directions printed to a restaurant on her desk, and upon learning they were for her and the housekeeper who were about to leave for lunch, Coulam began to scream at her so loudly, the housekeeper reported afterwards she heard him from the other side of the house. In fear of retaliation, prior to this day, Ms. Pena had objected to the inappropriate work he had her perform, as well as to his abusive behaviors more gently and subtly; however, after this incident, Ms. Pena told him very clearly and calmly his behavior was inappropriate, and asked him to *please* refrain from being abusive with her going forward, defining the inappropriate behavior so there was no confusion.

5.14 Upon returning from her one week vacation, Monday, August, 8, 2016, having confronted Coulam regarding his inappropriate behavior Friday, July 29<sup>th</sup>, Ms. Pena was terminated immediately upon entering the home premises.

- 5.15 Plaintiff believes that she is being discriminated against based on sex due to Mr. Coulam's sexual harassment and retaliated against in violation of Title VII of the Civil Rights Act, as amended.

**6. CAUSE OF ACTIONS – SEXUAL HARASSMENT and RETALIATION**

- 6.1. Defendant discriminated against Plaintiff and placed her in a hostile work environment in violation of Title VII of the Civil Rights Act, as amended, based on gender (female) (sexual harassment). Defendant sexually harassed Plaintiff by forcing her to perform duties that were deprived.
- 6.2. Defendant retaliated against Plaintiff for engaging in a protected activity by terminating her in violation of Title VII, of the Civil Rights Act of 1964, as amended.

**7. ATTORNEY'S FEES**

- 7.1. Defendant's action and conduct as described herein and the resulting damage and loss to Plaintiff has necessitated Plaintiff retaining the services of ROSENBERG & SPROVACH, 3518 Travis, Suite 200, Houston, Texas 77002 in initiating this proceeding. Plaintiff seeks recovery of reasonable and necessary attorney's fees.

**8. PRAYER**

- 8.1.1. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that Defendant be cited to appear and answer, and that on final hearing of this cause Plaintiff have the following relief:

8.1.2. Judgment against Defendant, for actual damages sustained by Plaintiff as alleged herein;

8.1.3. Judgment against Defendant for backpay lost by Plaintiff as alleged herein;

- 8.1.4. Judgment against Defendant, for front pay by Plaintiff as alleged herein;
- 8.1.5. Grant Plaintiff general damages for the damage to Plaintiff's reputation;
- 8.1.6. Pre-judgment interest at the highest legal rate;
- 8.1.7. Post-judgment interest at the highest legal rate until paid;
- 8.1.8. Punitive damages;
- 8.1.9. Damages for mental pain and mental anguish.
- 8.1.10. Exemplary damages;
- 8.1.11. Attorney's fees;
- 8.1.12. All costs of court expended herein;
- 8.1.13. Such other and further relief, at law or in equity, general or special to which Plaintiff may show herself to be justly entitled.

Respectfully submitted,

**/s/ Gregg M. Rosenberg**

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